

### **III. REMARKS**

Applicant has reviewed the non-final Office Action of January 26, 2005 ("Office Action").

#### **A. Invention**

The present invention is generally related to processing transaction requests. More particularly, the present invention is related to the distribution of personal identification numbers (PINs) and/or stored-value cards between a plurality of users and a central processor over a communication network.

#### **B. Amendments**

Claims 2, 33, and 50 have been amended. All amendments are supported by the specification and claims as filed. In sum, claims 1-58 are pending.

The specification is amended in response to a drawing objection. The Office Action notes that paragraph [0022] recites that FIG. 1 shows a "data management system 14,"<sup>1</sup> but there is no item labeled "14" in FIG. 1. Applicant submits that "data management system 14" was referring to item "28," which is also referred to as "central processor 28."

The specification supports this amendment. In paragraph [0022], the specification states: "The point-of-sale merchant terminal 12...is used to send a request to a stored-value card data management system 14...." In the next two paragraphs, the specification

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<sup>1</sup> Although page 2 of the Office Action referred to this item as "description management system 14," paragraph [0022] of the specification shows this term to be "data management system 14."

clarifies that the entity to which the point-of-sale merchant terminal 12 sends the request is also called central processor 28. The specification states:

Central processor 28 may comprise a processor 16 coupled to a database 18. The central processor 28 may comprise a host computer, a computer server, a computer system with software applications that receive transactions and process them according to preset rules, and any other computer system. The database 18 may store a plurality of records comprising stored-value card data for each stored-value card issued by the assignee of the present invention. The plurality of records may also comprise keycard data for each keycard that may be used at the remote terminals 12.

A respective requesting terminal 12 may send a keycard-related request through a communications network 10 and/or a suitable host bank 20 to the central processor 28.

This description also shows that central processor 28 could be considered a “data management system”. Furthermore, FIG. 2 and its associated description clearly show the terminal 12 communicating with central processor 28.

For at least these reasons, the specification supports the amendment to the specification that changes “data management system 14” to “data management system 28.”

### **C. Correction of Drawings**

The Office Action objected to FIGS. 1 and 2 for failing to include a “[data] management system 14” and “terminal database/memory 26” (which was labeled 25 in Figure 2), respectively.

Accordingly, Applicant has provided a replacement drawing for FIG. 2 that shows the terminal database/memory labeled as “26” instead of “25.” The replacement drawing of FIG. 2 is attached hereto and labeled as “Replacement Sheet.” Applicant respectfully requests that this replacement sheet be entered as a replacement for the former FIG. 2.

**D. Objection to Claims 33 and 50**

The Office Action objected to claims 33 and 50 for formal reasons. Applicant has made corresponding amendments to those claims. Applicant respectfully submits that claims 33 and 50, as amended, overcome the objections.

**E. Rejection of Claims 1-4, 7-16, and 19-58 Under 35 U.S.C. § 102(e) As Being Anticipated By Risafi**

Claims 1-4, 7-16, and 19-58 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,473,500 to Risafi ("Risafi"). Risafi discloses a transaction card that stores transaction information, wherein the card is usable by customers to purchase goods and services. Risafi also discloses that a cardholder can select a security PIN that governs access to an account associated with the stored value card.

All the claims recite (or incorporate by reference) a "keycard." Risafi does not disclose or suggest a keycard. Instead, Risafi is directed to stored value cards. As described in the specification, a "keycard" is not itself a stored value card. It cannot be used to gain access to the funds of a stored value account. Rather, a keycard is a tool that can be used by a retailer for the purpose of selling or distributing a plurality of PINs and/or stored value cards. Keycards are related to stored value cards in the sense that a keycard can be used by a merchant as a tool for selling a stored value card (or a PIN).

Thus, the keycard itself is not a stored value card. Stored value cards are typically defined as having an account number and an associated value -- like the cards disclosed in Risafi. Risafi fails to disclose the use of a device such as a card to facilitate the purchase of its disclosed stored value cards, and thus Risafi fails to disclose a keycard.

Risafi also does not disclose or suggest many of the independent claim features.

For example, claim 2 as amended recites “wherein the keycard is associated with...activating a stored-value account, adding value to a stored-value account, or transferring value from a stored-value account.” Risafi does not disclose a card that is associated with one of the specifically enumerated transaction types of activating, adding value, and transferring value. While Risafi’s cards may be activated and used to purchase goods and services, and while the cards may be associated with a specific account, account number, and human purchaser, the cards themselves are not directly associated with a transaction type. In contrast, a keycard can be associated with a specific transaction type. For instance, one keycard can be associated with “card activation” transactions while another keycard can be associated with “card reload” transactions.

For at least these reasons, Applicant respectfully requests that the instant rejection of claims 1-4, 7-16, and 19-58 be withdrawn.

**E. Rejection Of Claims 5, 6, 17, and 18 Under 35 U.S.C. § 103(a)  
As Being Unpatentable Over Risafi In View Of Poore**

Claims 5, 6, 17, and 18 were rejected under 35 U.S.C. 103(a) as being unpatentable over Risafi in view of U.S. Patent No. 6,202,933 to Poore et al. (“Poore”). Like Risafi, Poore discloses a transaction card that stores transaction information, wherein the card is usable by customers to purchase goods and services. As discussed above, Risafi does not disclose or suggest a “keycard” as recited or incorporated in all the claims. Poore does not remedy the deficiencies of Risafi. Thus, the combination of Risafi and Poore similarly fails to disclose or suggest the rejected claims.

For at least these reasons, Applicant respectfully requests that the instant rejection of claim 5, 6, 17, and 18 be withdrawn.

#### IV. Conclusion

For all the reasons set forth above, it is respectfully submitted that all outstanding rejections have been overcome or rendered moot. Further, all pending claims are patentably distinguishable over the prior art of record. All amendments are supported by the specification and claims as originally filed. Applicant accordingly submits that these claims are in a condition for allowance. Reconsideration and allowance of all claims are respectfully requested.

Authorization is hereby granted to charge or credit the undersigned's Deposit Account No. 50-0206 for any fees or overpayments related to the entry of this Amendment, including any extension of time fees and new claims fees.

Applicant notes that the Attorney Docket Number for this application has changed from 64243.000018 to 62941.002018.

Respectfully submitted,

Date: 6/9/05

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